



275 #Phoenicia, Ltd. v. (EFCO) 1001, United Kingdom

30 April 2015

SKAT
Betaling og Regnskab
Helgeshøj Alle 9
2630 Taastrup
Denmark

Attention: Sven Nielsen, Danish Dividends Tax Department

Re: Danish Dividend Tax Reclaim for:
The FWC Capital LLC Pension Plan (TIN: 47-2069447)
450 Alton Rd #1603, Miami Beach, Miami, FL, 33139, USA

Dear Sven,

In connection with the Convention for the Avoidance of Double Taxation between Denmark and the United States of America, please find enclosed a reclaim application from a qualifying US pension fund for a complete refund of Danish Dividend Tax that was previously withheld in relation to their investments.

Please find enclosed the following forms to assist with the claim:

- A completed 06.003 ENG Form - Claim to Relief from Danish Dividend Tax;
- Two original Dividend Credit Advice slips;
- An original Certificate of Residence – Form 6166 - for tax year 2014;
- The Power of Attorney granted by The FWC Capital LLC Pension Plan to Syntax GIS Ltd.

Please contact us should you have any questions or require any further information.

Yours sincerely,

Camilo Vargas, Director | +44 20 3709 4185 | cv@syntax-gis.com

The name Syntax GIS is a registered trade mark of Syntax GIS Ltd. Syntax GIS Ltd is a limited liability company registered in England and Wales, company number 10512589, and has its registered office at 145 157 St John Street, London, EC1Y 4PS, United Kingdom. VAT registration number 185125890.

SKAT-Fredensborg

Bilag nr. 3-9-1



Claim to Relief from Danish Dividend Tax

☐ In my capacity as beneficial owner ☒ On behalf of the beneficial owner

Claim is made for refund of Danish dividend tax, in total DKK: 3,037,306.22

Beneficial Owner

Full name
The FWC Capital LLC Pension Plan

Full address
450 Alton Rd #1603, Miami Beach, Miami, FL, 33139, USA

E-mail
taxreclaims@syntax-gis.com - attention: Camilo Vargas - (+44 020 37094186)

Signature
Beneficial owner/applicant

.....
Camilo Vargas

If the claim is made on behalf of the beneficial owner the applicant's power of attorney shall be enclosed

As documentation is enclosed dividend advice(s), number: 2

(This documentation is obligatory)

Financial institution

The amount is requested to be paid to:

Name and address

Barclays Bank Plc.
Building 315, Heathrow Airport, Hatton Cross, TW6 2JJ, United Kingdom
Name of the Account holder: Syntax GIS Ltd

Reg. no Account no

46065800

SWIFT BLZ IBAN

BARCGB22 GB76 BARC 203883 4606 5800

Certification of the competent authority

It is hereby certified that the beneficial owner is covered by the Double Taxation Convention concluded between Denmark and

Date

Official stamp and signature

When signed to be forwarded to:

Skattecenter Høje-Taastrup
Postboks 60
DK-2630 Taastrup

SKAT Fredensborg

Bilag nr. 3-9-2

301007 021 m. 11 2013

06.003 ENG

OLD PARK LANE CAPITAL PLC

INCOME ADVICE

The FWC Capital LLC Pension Plan, 49 E 21st Street, New York, NY 10010, United States of America, ,

CHR HANSEN HOLDING A/S


Ticker	ISIN
CHR DC	DK0060227585

Dividend

Ex-dividend Date	Record Date	Payment Date
28-11-2014	01-12-2014	02-12-2014

Payment details

Dividend Per Share	No. of shares	Gross	Tax	Net
DKK 3.77	846,864	DKK 3,192,677.28	DKK 862,022.87	DKK 2,330,654.41


 Name: Michael Parnes
 Old Park Lane Capital PLC

SKAT Fredensborg

Bilag nr. 3-9-3

OLD PARK LANE CAPITAL PLC

INCOME ADVICE

The FWC Capital LLC Pension Plan, 49 E 21st Street, New York, NY 10010, United States of America, ,

COLOPLAST-B

Ticker
COLOB DC

ISIN
DK0060448595

Dividend


Ex-dividend Date
05-12-2014

Record Date
08-12-2014

Payment Date
09-12-2014

Payment details

Dividend Per Share	No. of shares	Gross	Tax	Net
DKK 7.50	1,074,214	DKK 8,056,605.00	DKK 2,175,283.35	DKK 5,881,321.65


Name: Michael Parnes
Old Park Lane Capital PLC

SKAT Fredensborg

Bilag nr. 3-9-4



CERTIFICATION
PROGRAM

DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
PHILADELPHIA, PA 19255

Date: March 2, 2015



000469

Taxpayer: THE FWC CAPITAL LLC PENSION PLAN
TIN: 47-2069447
Tax Year: 2014

I certify that, to the best of our knowledge, the above-named entity is a trust forming part of a pension, profit sharing, or stock bonus plan qualified under section 401(a) of the U.S. Internal Revenue Code, which is exempt from U.S. taxation under section 501(a), and is a resident of the United States of America for purposes of U.S. taxation.

Nancy J. Aiello

Nancy J. Aiello
Field Director, Accounts Management

SKAT Fredensborg

Bilag nr. 3-9-5



255, Whitechapel Road, London, E1 1AB, United Kingdom

LIMITED POWER OF ATTORNEY

The FWC Capital LLC Pension Plan, (the "Grantor") TAX ID: 47-2069447,

With an address at: 450 Alton Rd #1603, Miami Beach, Miami, Florida, 33139, USA.

hereby makes, constitutes and appoints Syntax GIS Ltd, a UK corporation, having its principal place of business at Tower Bridge Business Centre, 46-48 East Smithfield, London, E1 1AW, United Kingdom as its true and lawful attorney-in-fact and agent, to

1. Sign and file with applicable authorities any and all applications, requests, or claims for refund, reduction, repayment, and credit of, or exemption or relief from, any withholding or similar taxes in any jurisdiction,
2. To request a refund of the excess tax withheld by submitting claims with foreign custodians, withholding agents, or issuers.
3. To obtain any documents or other information required for that purpose, including but not limited to requesting and obtaining tax residency certification in the name of the Grantor as may be necessary to carry out the above.
4. To represent the Grantor at all kinds of administrative appeals and present economic-administrative reclaims to the relevant authorities, tribunals, and courts.
5. To receive and distribute all repayments owed in above context from foreign tax authorities, custodians, withholding agents or issuers in the name of the Grantor and to acknowledge the receipt of such amounts.

This Limited Power of Attorney shall take effect upon execution of the document and remain in effect until the Limited Power of Attorney has been terminated by either party by providing ten days prior written notice of its intent to terminate to the other party, whichever is earliest.

IN WITNESS WHEREOF we have caused this Limited Power of Attorney to be executed by our duly authorized representative this 5th day of March, 2015.

For: The FWC Capital LLC Pension Plan

With an address at: 450 Alton Rd #1603, Miami Beach, Miami, Florida, 33139, USA

Signature: _____

Name: _____

Roger Lehman

Title: _____

Authorised Representative

The name(s) of the signatory must be the same as the name(s) of the signatory in the original document. The name(s) of the signatory must be the same as the name(s) of the signatory in the original document. The name(s) of the signatory must be the same as the name(s) of the signatory in the original document.

SKAT Fredensborg

Bilag nr. 3-9-6